

Message

From: MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]
Sent: 7/17/2017 10:37:05 PM
To: Fennessy, Christopher [christopher.fennessy@Rocket.com]
CC: Gallagher, Dan@DTSC [Dan.Gallagher@dtsc.ca.gov]; Keller, Lynn [Keller.Lynn@epa.gov]
Subject: Response to Requested Information Submittal

Hi Chris,

Thank you for the provided information. DTSC is currently evaluating the newly updated TCE iso-concentration plume maps and expects this submittal to further support its request for additional sub-surface vapor sampling as previously indicated in email correspondence on 6/30/17.

Upon reviewing the provided aerial figures and those attached to "The EDR Aerial Photo Decade Package" DTSC noted several discrepancies related to the aerial photograph years. Specifically, aerial photographs from 1937, 1958, 1964, 1972, 1984, 1993, and 1998 were provided for Area 40. When comparing to the Appendix E "Aerial Photo Review" for Section 1.4 (Area 40) it identifies Aerial photos for the years 1956, 1961, 1971, 1981, 1983, 1985, 1988, 1989, 1991, and 1999. This gives the impression that there are other existing aerial photos related to Area 40 that were not submitted as part of this information request. While it is written that "Available Photos do not cover Area 40" for several of these omitted years, there is no validation of this statement because it cannot be confirmed independently similarly to the "interpreted features" for years 1961, 1985, 1988 which were not submitted.

Please clarify this discrepancy and provide the additional aerial photographs as identified in Section 1.4 of the Aerial Photograph Review Summary for Island Operable Unit so DTSC may complete its review and assessment.

Sincerely,



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From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Wednesday, July 12, 2017 7:44 AM
To: MacNicholl, Peter@DTSC
Cc: 'Keller, Lynn (Keller.Lynn@epa.gov)'; MacDonald, Alex@Waterboards
Subject: RE: [EXTERNAL] Re: Requested Information

Hi Peter – Attached are the remaining documents I believe you requested. The aerial photographs use in the SAP were never published, just a discussion of the findings (which is attached); however, attached are aerials for this area that should meet your needs (1937, 1958, 1964, 1972, 1984, 1993, and 1998). Let me know if you need additional information. Chris

Christopher M. Fennessy, P.E.
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From: MacNicholl, Peter@DTSC [<mailto:Peter.MacNicholl@dtsc.ca.gov>]
Sent: Monday, June 26, 2017 12:12 PM
To: Fennessy, Christopher
Cc: 'Keller, Lynn (Keller.Lynn@epa.gov)'; MacDonald, Alex@Waterboards
Subject: [EXTERNAL] Re: [EXTERNAL] Re: Requested Information

Hi Chris,

If you and your team can provide the materials I listed (1 thru 5) that would go a long ways to helping us complete our supplementary RIS comments and play into the review of the FS, soil gas data, and alternatives.

Written comments from GSU on the RIS are forthcoming this week. Additionally further GSU comments on the soil gas maps/figures beyond those related to the re-drawing of the isopleths using concentrations vs. risk are planned to be presented to AR this week as well. Stay tuned. Regards.

-Pete

From: Fennessy, Christopher <christopher.fennessy@Rocket.com>
Sent: Saturday, June 24, 2017 9:40:34 AM
To: MacNicholl, Peter@DTSC
Cc: 'Keller, Lynn (Keller.Lynn@epa.gov)'; MacDonald, Alex@Waterboards
Subject: RE: [EXTERNAL] Re: Requested Information

Sure thing Peter. Sorry, I do recall our e-mail discussion regarding an internal figure I prepared for our management team, which did not present all of the data. I believe I replied to your request stating that due to the lack of completeness, I was not going to send that figure out. There are several figures that present the entire data set, soil vapor sample locations with TCE data in a table on the figure and all the land use areas. It just takes a little work to post the results beside each location (if the relative concentration as depicted by the color coding does not provide sufficient clarity). We are working on a map that shows this per the request on Wednesday. Should be ready next week. We will also gather the rest of the information requested.

We agree that there is a high concentration of TCE in a soil vapor location in close proximity to the planned residential neighborhood. That location is bound in all directions, albeit into the neighborhood. Per the SAP for the recent RIS at Area 40, soil vapor samples were to be collected at 10' and 20' bgs. No shallower samples were recommended. Historic locations may have had 5'bgs results, but experience has shown that there is a high probability of short circuiting at those shallow depths so the Agencies and Aerojet agreed that 10 feet bgs was

the shallower sample (unless drilling did not allow advancement to 10 feet).

I do not feel we need temporal data from this location to make decisions on how to move forward. If additional data is needed, we need to understand how the data will be used to make remedy decisions. For example, if we sample the line of soil vapor points that define the extent of the plume and find that the concentrations remain below 16ug/m3, what decisions will be made for the houses located closer to the plume than these wells where we previously detected 1500ug/m3?

We are looking forward to receipt of your comments on the RI and FS and the ensuing discussion.

Chris

-----Original Message-----

From: MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]

Sent: Friday, June 23, 2017 07:02 PM Pacific Standard Time

To: Fennessy, Christopher

Subject: [EXTERNAL] Re: Requested Information

Hi Chris,

Thank you for your willingness to support the agency reviews and evaluations.

I think you may have been referring to what I mentioned during the meeting on Wednesday. I had sent you emails several days prior inquiring on soil gas step out sampling figure dated 1/8/2015 but also re: soil vapor sampling locations on the northern end of Area 40, specifically 37B SP25. My point was the TCE concentration was extremely high registering 710,000 ug/m3 between 10-20' bgs, but there was no sample taken at less than 10' which was unusual considering many of the other locations had samples for less than 10' interval. Obviously my concern is the proximity of the data relative to the Village development and this illustrates the potential that soil gas needs further longer term investigational data (at this location and many others) to truly assess the variability, distribution, & concentrations due to temporal and barometric changes. DTSC will be providing further direction next week that I hope AR can utilize to augment or replace the existing datasets. Stay tuned.

In the meantime, I would like to review the deliverables or materials related to the following items I mentioned during and at the conclusion of the meeting:

- 1.) USEPA Rad comments related to the former Rad Technical Memorandum and RIS;
- 2.) ALL Site Operational Aerial Photographs available and those included in the 2007 SAP?;
- 3.) TCE Vapor map contoured using actual logarithmic isopleths instead of the health risk based numbers;
- 4.) 1,4-dioxane GW data for Area 40; and,
- 5.) Figures & tables showing the new Perc. data presented at the last stakeholder meeting on June 8th.

Thanks for your assistance in the above mentioned items.

-Pete

From: Fennessy, Christopher <christopher.fennessy@Rocket.com>

Sent: Friday, June 23, 2017 11:03 AM

To: MacNicholl, Peter@DTSC
Subject: Requested Information

Hi Peter – You mentioned Wednesday that you had sent me a request for information a while back, for which I did not fully respond. I apologize. Can you please resend your request? I will ensure prompt reply. Thanks! Chris

Christopher M. Fennessy, P.E.

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